

Amplia Communications Limited Robocall Mitigation Plan

Background: Amplia Communications Limited is a subsidiary of the Telecommunications Services of Trinidad and Tobago (TSTT), who is also listed in the FCC Robocall Mitigation Database. Our company operates in the country of Trinidad and Tobago and utilizes the 609 NXX/CO Code. As such, our international caller IDs will have the format: 1868609XXXX. Our voip network and infrastructure is used to provide fixed line services as well as SIP trunks to our enterprise customers. We are also partnered with international providers such as 42Com/Vodacode, who we route all international calls to while also routing their traffic towards our parent company, TSTT.

The following aspects should be noted as part of our Robocall Mitigation Plan as we send calls internationally.

Technical:

- 1) Only calls that conform to our caller ID format and also those allocated for our company's use, will be sent to our international and local providers. Calls originating from our network with non-Amplia caller IDs will not be routed towards the PSTN.
- 2) We also do not route calls from other providers to international destinations. We only route calls from our company to our international provider.
- 3) All our services including voip are handed off to our customers via our FTTH network with CPE that is installed and managed by the company. In the event of issues originating from a customer's circuit, action can be taken.
- 4) Fixed line customers utilize SIP enabled devices which are owned and managed by Amplia. This device does registration and authentication with our SIP server but hands off analog lines towards our customers. All configs on these devices are managed by the company and unknown to the customer.
- 5) SIP Trunk customers' circuits are provisioned off our FTTH CPE using our private networks and not over the internet. This allows better security within our SIP infrastructure.
- 6) Via tools such as packet captures, server logs, database queries and other interrogation methods, we are able to troubleshoot and gain information on the calls coming from our network.
- 7) The PAI info will be sent along with the call. Each of our customers will have their own ID sent in the PAI headers of calls. This can help identify customers.

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Administrative:

- 1) The company maintains records of their customers for contact and billing purposes. The company also adopts the Know Your Customer (KYC) protocol when creating and managing customers. As such we keep records containing valid details on our customers and can directly engage them. Some of this info is also included in the provisioning of the phone numbers of customers for tracing and accountability.
- 2) Our SIP trunk customers are notified via agreements and other correspondence on the requirements for their voip traffic such as their CID format, DIDs and channels. Any use, other than what is provisioned will be monitored. Customers will be notified or corrective action taken depending on the severity of this.
- 3) The company does not assign phone numbers or DIDs to customers outside our allocated range of 1868609XXXX. As such we do not assign international numbers or numbers from other local operators to our customers.
- 4) The company functions as an intermediary company when routing calls from our subscribers to international destinations. These calls are sent to our provider, 42Com who are also listed in the Robocall Mitigation Database and have their own mitigation methods.
- 5) Reports based on the CDRs for outbound international calls are auto-generated from our SIP servers and monitored by our 24/7 NOC. These reports show the number of international calls and the minutes incurred in order to determine whether any suspicious threshold is reached. Further action can then be taken.

Co-operative:

- 1) Our parent company, Telecommunications Services of Trinidad and Tobago is also listed in the database and has filed their entry on behalf of us as well. Our international provider, 42Com is also listed. We share info among our partners within our laws and regulations. If however the FCC or other regulative entity requires info on calls coming from our network, we are also willing to share information similarly and work together towards resolving any issues.

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